

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY
NINETEENTH JUDICIAL DISTRICT AT CLARKSVILLE, TENNESSEE

JEDONNE MATTHEWS,

Plaintiff,

vs.

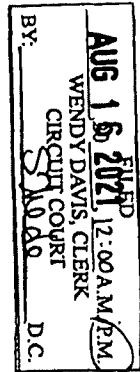
WALMART INC.,
WAL-MART STORES EAST, LP, and
WAL-MART SUPERCENTER #673,

Defendants.

No. CC2021CW1572

Judge Assigned

Kathryn Ouita



COMPLAINT

Comes now the Plaintiff and brings this action against the Defendants and would show unto the Court, at all times relevant hereto:

PARTIES

1. Plaintiff, Jedonne Matthews is a resident of Clarksville, Montgomery County, Tennessee.
2. Defendant, Walmart, Inc., is a foreign for profit, Delaware corporation authorized to conduct business in the State of Tennessee with its principal place of business being located at 708 SW 8th Street, Bentonville, Arkansas.
3. Defendant, Wal-Mart Stores East, LP, is a foreign for profit, Delaware corporation authorized to conduct business in the State of Tennessee with its principal place of business being located at 702 SW 8th Street, Bentonville, Arkansas.
4. Defendant, Wal-Mart Supercenter #673, is doing business in the State of Tennessee, with a business premises located at 3050 Wilma Rudolph Blvd., Clarksville, Tennessee.
5. At all times material herein, the Defendants, one or more of them, owned, operated,

EXHIBIT B

the Plaintiff, a duty to provide a safe environment for its patrons and a duty to maintain the premises in a reasonably safe manner so its business invitees would not be injured while on the premises.

12. Defendants breached said duty by failing to maintain the premises in a reasonably safe manner, by taking no steps to alleviate or warn Plaintiff of the danger, and by creating hazardous conditions or allowing hazardous conditions to continue to exist unresolved.
13. Defendants, through its agents, were negligent in creating or allowing a dangerous condition to exist when they knew or should have known through the exercises of reasonable diligence and care, of that condition's existence.
14. Defendants either knew or reasonably should have known that by creating a dangerous condition on the premises, invitees such as Plaintiff, could fall and cause a serious injury.

CAUSATION

13. As a result of Defendant's breach of said duty, Plaintiff suffered severe injuries, incurred and will continue to incur medical expenses, and has experienced chronic pain and suffering. The negligence of Defendants, as set forth above, directly and proximately caused the incident that resulted in injuries to Plaintiff and the damages and losses here sought by the Plaintiff.

INJURIES AND DAMAGES

17. As a direct and proximate result of the Defendants' negligence, Plaintiff asserts she is entitled to damages, including but not limited to the following specific items of damages:
 - a. Physical pain, both past and future;
 - b. Emotional suffering and grief, both past and future;
 - c. Health care expenses, both past and future;

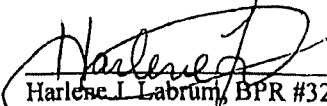
- d. Loss of enjoyment of life;
- e. Permanent impairment and partial disability;
- f. Loss of earning capacity;
- g. Lost wages;
- h. Costs of this cause; and
- i. All other general damages and other relief allowed under the laws of the State of Tennessee to which the Plaintiff may be entitled.

RELIEF SOUGHT

WHEREFORE, PLAINTIFF PRAYS:

- 1. For a judgment against the Defendants awardable to the Plaintiff for compensation for past and future medical expenses, past and future pain and suffering, for permanent impairment and disability, past and future lost wages and lost earning capacity and past and future loss of enjoyment of life, all in an amount not to exceed \$200,000 for the personal injury and disability suffered as the proximate result of the Defendants' negligence.
- 2. For cost of this matter to be taxed to the Defendants.
- 3. For such other, further and general relief to which the Plaintiff may be entitled under the law.

Respectfully submitted,


Harlene J. Labrum, BPR #32705
LABRUM LAW
718 Thompson Ln, Suite 108-242
Nashville, TN 37204
(615) 338-9500; Fax: 615-241-1110
Harlene@Labrumlawfirm.com